

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION**

**LACAZE LAND DEVELOPMENT L L C**

**CIVIL ACTION NO. 1:19-cv-01477**

**VERSUS**

**CHIEF JUDGE DRELL**

**DEERE & CO INC, et al**

**MAG. JUDGE PEREZ-MONTES**

**AMENDED COMPLAINT**

NOW INTO COURT, through undersigned counsel, comes plaintiff, Lacaze Land Development LLC, who amends its Complaint to add an additional party defendant herein and by adding certain paragraphs numbered sequentially to those found in the original Complaint, as amended, as follows:

“42. Made an additional defendant herein is AMERISURE INSURANCE COMPANY, (hereinafter “Amerisure”), an insurance company organized under the laws of the State of Indiana, domiciled at 26777 Halstead Rd., Farmington Hills, MI 48331-3586, authorized to do business in the State of Louisiana, whose agent for service of process is the Louisiana Secretary of State, 8585 Archives Avenue, Baton Rouge, Louisiana 70809.

“43. At all times material hereto, Amerisure had issued a policy of liability insurance in favor of defendant, W. L. DOGGETT, LLC, d/b/a DOGGETT MACHINERY SERVICES (“Doggett”), which may cover part or all of the claims of the plaintiff, and may compensate plaintiff for all or part of the damages sought from defendant Doggett, as set forth in Plaintiff’s Original Complaint, as amended.

“44. Amerisure is liable unto petitioner for any damages that may be awarded against defendant, Doggett, for part or all damages claimed therein, or to be awarded by this Honorable

Court, and petitioner requests that Amerisure Insurance Company be cast in judgment, *in solido*, for the same damages.

“WHEREFORE, Plaintiff/Complainant prays that its Amended Complaint be allowed and filed in accordance with the Motion filed simultaneously herewith.”

s/ Fred A. Pharis  
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